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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAURA LEIGH, individually, and WILD  
HORSE EDUCATION, a non-profit  
corporation,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
INTERIOR, BUREAU OF LAND  
MANAGEMENT, TRACY STONE-  
MANNING, Director of the Bureau of Land  
Management, and JON RABY, Nevada State  
Director of the Bureau of Land Management,

*Federal Defendants.*

CASE NO. 3:23-cv-00568-ART-CSD

**JOINT MOTION AND STIPULATION  
TO EXTEND THE DEADLINE FOR  
FILING A MOTION FOR  
ATTORNEYS' FEES**

Pursuant to Local Rule IA 6-1, Plaintiffs Laura Leigh and Wild Horse Education and  
Defendants United States Department of Interior, Bureau of Land Management (BLM), Tracy

1 Stone-Manning, in her official capacity as Director of the BLM, and Jon Raby, in his official  
2 capacity as Nevada State Director of the BLM, (collectively, the “Parties”), by and through  
3 their undersigned counsel, hereby stipulate and respectfully request that the Court extend the  
4 time to file any motions related to attorneys’ fees and costs by 30 days, until September 5,  
5 2025. In support of this request, the Parties declare:

6 WHEREAS, on July 23, 2025, the Court issued an opinion and order on the Parties’  
7 cross-motions for summary judgment. ECF No. 53.

8 WHEREAS, on July 23, 2025, judgment was entered by the Clerk of the Court. ECF  
9 No. 54.

10 WHEREAS, pursuant to Rule 54(d)(2)(B), Plaintiffs must file a motion for attorneys’  
11 fees and costs on or before August 6, 2025.

12 WHEREAS, Plaintiffs’ counsel is scheduled to be out of state for a long-planned  
13 family vacation from July 27 to August 12,

14 WHEREAS, the parties have met and conferred to determine whether Defendants  
15 would agree to extend the deadline for Plaintiffs to file their motion for attorneys’ fees by  
16 thirty days to September 5, 2025.

17 WHEREAS, Defendants do not oppose this motion and hereby stipulate to the new  
18 deadline for Plaintiffs’ motion as September 5, 2025.

19 WHEREAS, this is the first stipulation for an extension of time to file a motion for  
20 attorneys’ fees and costs.

21 WHEREAS, it is well-established that the court has the inherent power to “control the  
22 disposition of the causes on its docket with economy of time and effort for itself, for counsel,  
23 and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *CMAX, Inc. v. Hall*,  
24 300 F.2d 265, 268 (9th Cir. 1962); *Leyva v. Certified Grocers of California*, 593 F.2d 857,  
25 863-64 (9th Cir. 1979).  
26  
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1 NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,  
2 AND THE COURT ORDERS, AS FOLLOWS:

3 Upon entry of the Court's order, the deadline to file any motion for attorneys' fees  
4 and costs is extended from August 6, 2025, until September 5, 2025.

5  
6 IT IS SO STIPULATED.

7 Dated: July 28, 2025,

Respectfully Submitted,

8 /s/ Jessica L. Blome

9 GREENFIRE LAW, PC

Jessica L. Blome

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22 ADAM R.F. GUSTAFSON, Acting Assistant  
Attorney General

23 U.S. Department of Justice

Environment & Natural Resources Division

24 /s/ Joseph W. Crusham

25 JOSEPH W. CRUSHAM, Trial Attorney

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27 YOUNG A. KANG, Trial Attorney

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8 *Attorneys for Federal Defendants*

9 IT IS SO ORDERED:

10 \_\_\_\_\_  
11 HON. ANNE R. TRAUM  
12 UNITED STATES DISTRICT JUDGE

13 DATED: \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2025, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the District of Nevada using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system, which includes counsel of record for all parties in the case.

/s/ Jessica L. Blome  
Jessica L. Blome  
*Attorney for Plaintiff*